

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 04/30/2023
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant
Covington & Burling LLP
- (b) Registration Number
6876
- (c) Primary Business Address
850 10th Street, Washington, DC 20001

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|---|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

From time to time, partners not associated with the foreign principals join or leave the partnership.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.

3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6-month reporting period, did any employee or individual working in any capacity, other than in a clerical or secretarial capacity or in a related or similar capacity, begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s)?

Yes ☐ No ☒

Name	Foreign Principal	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing?

Yes ☐ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant registered for any new foreign principal(s)² during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal

Date Registered

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

OCP S.A.
SCM Consulting Limited

10. (a) Have the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes ☐ No ☐ N/A ☒

Exhibit B⁴ Yes ☐ No ☐ N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and/or B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period? Yes ☐ No ☒

If yes, has the registrant filed an amendment to these exhibits? Yes ☐ No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
See Appendix for Response	

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

OCP S.A.: See response to item 11.

SCM Consulting Limited: See response to item 11.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) RECEIPTS-MONIES

See Appendix for Response

\$	221,735.25
<hr/>	
Total	

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☐ No ☒

If no, explain why no disbursements were made.

See Appendix for Response

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
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Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
11/01/2022	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
11/01/2022	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
11/15/2022	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00
12/01/2022	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
12/01/2022	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
12/15/2022	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00
01/03/2023	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
01/03/2023	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
01/13/2023	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00
02/01/2023	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
02/01/2023	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
02/15/2023	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00
03/01/2023	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
03/01/2023	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
03/15/2023	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00
03/23/2023	Stephen Rademaker	Moore for West Virginia	Online payment	\$ 1,000.00
03/27/2023	Bruce Wilson	Kaine for Virginia (through Kaine Victory Fund)	Online payment	\$ 1,000.00
04/03/2023	Stephen Rademaker	Covington & Burling PAC	Payroll deduction	\$ 83.00
04/03/2023	Bruce Wilson	Covington & Burling PAC	Payroll deduction	\$ 250.00
04/14/2023	Alan Larson	Covington & Burling PAC	Payroll deduction	\$ 83.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

SCM Consulting Limited

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

<input type="checkbox"/> Magazine or newspaper	<input type="checkbox"/> Advertising campaigns	<input type="checkbox"/> Press releases	<input type="checkbox"/> Pamphlets or other publications
<input type="checkbox"/> Lectures or speeches	<input type="checkbox"/> Radio or TV broadcasts	<input type="checkbox"/> Motion picture films	<input type="checkbox"/> Letters or telegrams

☒ Email

☐ Website URL(s): _____

☐ Social media websites URL(s): _____

☒ Other (specify) White paper

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

<input checked="" type="checkbox"/> Public officials	<input type="checkbox"/> Newspapers	<input type="checkbox"/> Libraries
<input checked="" type="checkbox"/> Legislators	<input type="checkbox"/> Editors	<input checked="" type="checkbox"/> Educational institutions
<input checked="" type="checkbox"/> Government agencies	<input type="checkbox"/> Civic groups or associations	<input type="checkbox"/> Nationality groups

☒ Other (specify) Former public official

20. Indicate the language used in the informational materials:

☒ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature ¹³
05/30/2023	James Garland	/s/James Garland

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

May 30, 2023James M. GarlandJames M. Garland

Appendix

Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal(s)	Activities/Services
OCP S.A.	<p>Registrant assisted in a public relations campaign regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports, including (1) developing engagement strategy with customers of OCP N.A., trade groups, and other third parties regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (2) advising on U.S. government lobbying regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; (3) consultation regarding media relations regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports; and (4) assisting in preparation of OCP N.A. internal talking points and messaging materials regarding countervailing duty investigations by the U.S. government into phosphate fertilizer imports. Covington & Burling LLP is also outside counsel to OCP S.A. and provides various, non-registerable legal services for OCP S.A., including representation of OCP S.A. in the pending injury proceeding at the International Trade Commission, Inv. No. 701-TA-CEO-651, and the countervailing duty investigation at the Department of Commerce.</p>
SCM Consulting Limited	<p>Registrant provided strategic and policy advice, as well as associated lobbying services, in support of measures designed to seek reparations for damage inflicted on Ukrainians in the course of Russia's invasion of Ukraine. Additionally, registrant (1) communicated with U.S. Universities and U.S. think tanks regarding Russia's invasion of Ukraine, and (2) developed and disseminated a white paper to audiences in the U.S. regarding the justification for seizure of Russian state assets under international law.</p> <p>Registrant also engaged in nonregistrable activities on behalf of SCM Consulting Limited and System Capital Management (SCM) affiliated persons, including the provision of services related to the resolution of legal disputes before non-U.S. bodies.</p> <p>In addition to the information reported in items 14 and 15, the registrant made disbursements on behalf of and received payments from SCM Consulting Limited and System Capital Management (SCM) affiliated persons in connection with nonregistrable activities during the reporting period.</p>

Appendix

Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	11/01/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/01/2022	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/02/2022	Jonathan Fritz, Chief of Staff to Under Secretary of State for Economic Policy, State Department	Email	Meeting to discuss reparations
SCM Consulting Limited	11/02/2022	John Duncan, Deputy Chief of Staff to Under Secretary of State for Economic Policy, State Department	Email	Meeting to discuss reparations
SCM Consulting Limited	11/02/2022	Victoria King, Special Ass't, Office of Under Sec'y of State for Economic Policy, State Dept.	Meeting	Meeting to discuss reparations
SCM Consulting Limited	11/02/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/02/2022	Omar Hossino, Senior Policy Counsel, House Republican Study Committee	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/03/2022	Omar Hossino, Senior Policy Counsel, House Republican Study Committee	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/03/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	11/04/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/04/2022	Omar Hossino, Senior Policy Counsel, House Republican Study Committee	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/05/2022	Omar Hossino, Senior Policy Counsel, House Republican Study Committee	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/05/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/07/2022	Jim O'Brien, Sanctions Coordinator, State Department	Email	Requesting a second meeting
SCM Consulting Limited	11/07/2022	Xiyue Wang, Professional Staff, House Republican Study Committee	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/07/2022	Omar Hossino, Senior Policy Counsel, House Republican Study Committee	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/09/2022	Kyle Parker, Chief of Staff, Commission on Security and Cooperation in Europe	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/09/2022	Demetra Pappas, Policy Advisor, Commission on Security and Cooperation in Europe	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/09/2022	William Connor, Policy Advisor, Commission on Security and Cooperation in Europe	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/09/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email, Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	11/10/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/10/2022	Blake Pritchett, Deputy Director, Office of Sanctions Policy, Implementation, State Department	Video conference	Legal and policy basis for vesting of assets
SCM Consulting Limited	11/10/2022	Andrew Keller, Chief Counsel, Senate Committee on Foreign Relations	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/10/2022	Jim O'Brien, Sanctions Coordinator, State Department	Email	Legal and policy basis for vesting of assets
SCM Consulting Limited	11/11/2022	Monika Colon, Secretary for Jim O'Brien	Email	Requesting for the email coordinates of Blake Pritchett
SCM Consulting Limited	11/15/2022	Susan Adams, Clerk, State, Foreign Op's and Related Programs Subcomm. of House Approp's Comm.	Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/16/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/16/2022	Susan Adams, Clerk, State, Foreign Op's and Related Programs Subcomm. of House Approp's Comm.	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/18/2022	Jamie McCormick, Staff, State, Foreign Op's and Related Programs Subcomm. of House Approp's Comm.	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/18/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/18/2022	Robert Karem, National Security, Foreign Policy and Defense Advisor, Senate Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	11/18/2022	Robert Karem, National Security, Foreign Policy and Defense Advisor, Senate Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/19/2022	Robert Karem, National Security, Foreign Policy and Defense Advisor, Senate Republican Leader	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/21/2022	Robert Karem, National Security, Foreign Policy and Defense Advisor, Senate Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/22/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/22/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/28/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/28/2022	Dylan Clement, Professional Staff Member, Senate Committee on Banking, Housing, and Urban Affairs	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/29/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	11/29/2022	Allen Sousa, National Security Advisor and Counsel, House Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/01/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	12/05/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/05/2022	Allen Souza, National Security Advisor and Counsel, House Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/06/2022	Andrew Keller, Chief Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/06/2022	Jamie McCormick, Staff, State, Foreign Op's and Related Programs Subcomm. of House Approp's Comm.	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/06/2022	Allen Souza, National Security Advisor and Counsel, House Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/08/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/08/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/08/2022	Allen Souza, National Security Advisor and Counsel, House Republican Leader	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/08/2022	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/09/2022	Allen Souza, National Security Advisor and Counsel, House Republican Leader	Emails, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/12/2022	Allen Souza, National Security Advisor and Counsel, House Republican Leader	Emails, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	12/12/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/12/2022	Jonathan McKinley, Legislative Assistant, Office of Rep. Marcy Kaptur	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/12/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Texts, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/13/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/15/2022	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Text, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/15/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Text	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/21/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Texts	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/22/2022	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Text, Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/22/2022	A.J. Sugarman, Policy Advisor, House Republican Whip	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	12/22/2022	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	01/19/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	01/20/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Emails, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	01/31/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/03/2023	Collen Lewis, Legislative Assistant, Office of Sen. Joe Manchin	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/03/2023	Jim O'Brien, Sanctions Coordinator, Department of State	Email	Requesting a video conference or telephone call to discuss frozen Russian assets.
SCM Consulting Limited	02/03/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/04/2023	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/06/2023	Victoria Nuland, Under Secretary of State for Political Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/06/2023	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/06/2023	Collen Lewis, Legislative Assistant, Office of Sen. Joe Manchin	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/09/2023	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/13/2023	Phil Kaplan, Senior Advisor, Office of Terrorist Financing and Financial Crimes	Email	Requesting an appointment with Assistant Secretary Rosenfeld.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	02/13/2023	Donita Lucas-Brown, Office of Terrorist Financing and Financial Crimes	Email	Requesting an appointment with Assistant Secretary Rosenfeld.
SCM Consulting Limited	02/13/2023	Elizabeth Rosenfeld, Ass't Sec'y for Terrorist Financing and Financial Crimes, Dep't of Treasury	Email	Requesting an appointment with Assistant Secretary Rosenfeld.
SCM Consulting Limited	02/13/2023	Woon Cho, Office of Terrorist Financing and Financial Crimes	Email	Requesting an appointment with Assistant Secretary Rosenfeld.
SCM Consulting Limited	02/21/2023	Jim O'Biren, Sanctions Coordinator Department of State	Video Conference	Discussion confiscation of frozen Russian Assets
SCM Consulting Limited	02/21/2023	Erin McConaha, Chief of Staff for Sanctions Coordinator, Department of State	Video Conference	Discussion confiscation of frozen Russian Assets
SCM Consulting Limited	02/23/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/23/2023	Collen Lewis, Legislative Assistant, Office of Sen. Joe Manchin	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/24/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/24/2023	Collen Lewis, Legislative Assistant, Office of Sen. Joe Manchin	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	02/27/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/01/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/02/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Meeting, Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	03/06/2023	Jay Shambaugh, Under Secretary, Department of Treasury	Email	Request an appointment
SCM Consulting Limited	03/06/2023	Karen Delabarre- Chase, Chief of Staff, Department of Treasury	Email	Request an appointment
SCM Consulting Limited	03/09/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/10/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/10/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/10/2023	Seth Bridge, Coordinator REPO Task Force, Department of Treasury	Email	Reply to message from Seth Bridge, accept meetings and make suggestions regarding same
SCM Consulting Limited	03/10/2023	Jacob Klover-Owens, Sr. Advisor to the Under Sec'y for International Affairs, Dep't of Treasury	Email	Reply to message from Jacob Klover-Owens; accept proposed meeting with Seth Bridge
SCM Consulting Limited	03/11/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/11/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/14/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/16/2023	Seth Bridge, Coordinator REPO Task Force, Department of Treasury	Telephone Call	Discussion to hold time for a shared meeting
SCM Consulting Limited	03/22/2023	Amos Hochstein, Special Presidential Coordinator for Global Infrastructure and Energy Security	Meeting	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	03/23/2023	Will Mason, Financial Crime Bureau, Department of Treasury	Video Conference	Discuss policy and legal arguments for confiscation of Russian frozen assets and use of proceeds to assist Ukraine
SCM Consulting Limited	03/23/2023	Seth Bridge, Coordinator, REPO Task Force, Department of Treasury	Video Conference	Discuss policy and legal arguments for confiscation of Russian frozen assets and use of proceeds to assist Ukraine
SCM Consulting Limited	03/23/2023	Carlos Von Kessler, Financial Crime Bureau, Department of Treasury	Video Conference	Discuss policy and legal arguments for confiscation of Russian frozen assets and use of proceeds to assist Ukraine
SCM Consulting Limited	03/25/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/26/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/27/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	03/30/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/03/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/03/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/20/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Emails, Phone Call	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/25/2023	Seth Bridge, Coordinator REPO Task Force, Department of Treasury	Email	Convey a document entitled "Justification for Seizure of Russian State Assets Under International Law

Foreign Principal(s)	Date	Contact	Method	Purpose
SCM Consulting Limited	04/25/2023	Steve Fabry, Deputy Legal Adviser, Office of the Legal Adviser, Department of State	Email	Convey a document entitled "Justification for Seizure of Russian State Assets Under International Law
SCM Consulting Limited	04/25/2023	Jonathan Fritz, Chief of Staff, Office of Under Secretary Fernandez, Department of State	Email	Convey a document entitled "Justification for Seizure of Russian State Assets Under International Law
SCM Consulting Limited	04/25/2023	Jim O'Brien, Sanctions Coordinator, Department of State	Email	Convey a document entitled "Justification for Seizure of Russian State Assets Under International Law
SCM Consulting Limited	04/26/2023	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/26/2023	Katie Chaudoin, Professional Staff Member, Senate Committee on Foreign Relations	Emails	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/26/2023	Katie Earle, Professional Staff Member, House Committee on Foreign Affairs	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/27/2023	Paul Massaro, Senior Policy Advisor, Commission on Security and Cooperation in Europe	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.
SCM Consulting Limited	04/29/2023	Andrew Keller, Chief Counsel, Senate Committee on Foreign Relations	Email	Provision of compensation to Ukraine and Ukrainian claimants for damages resulting from Russian invasion.

Appendix
Response to Item 14(a)-Description

OCP S.A.: The registrant did not receive payments from OCP S.A. for registrable activities during the reporting period.

The registrant received payments for nonregistrable activities from OCP S.A. during the reporting period.

Appendix

Response to Item 14(a)-Detail

Foreign Principal(s)	Date Received	From Whom	Purpose	Amount	Subtotal
SCM Consulting Limited	11/03/2022	SCM Consulting Limited	Legal fees	\$15,318.00	
SCM Consulting Limited	12/15/2022	SCM Consulting Limited	Legal fees	\$34,811.20	
SCM Consulting Limited	01/19/2023	SCM Consulting Limited	Legal fees	\$67,400.37	
SCM Consulting Limited	02/09/2023	SCM Consulting Limited	Legal fees	\$61,220.08	
SCM Consulting Limited	02/09/2023	SCM Consulting Limited	Legal fees	\$42,985.60	
SCM Consulting Limited	-----	-----	-----	----->	\$221,735.25

Appendix

Response to Item 15(a)-Description

OCP S.A.: The registrant made no disbursements on behalf of OCP S.A. for registrable activities during the reporting period.

The registrant made disbursements on behalf of OCP S.A. in connection with nonregistrable activities during the reporting period.

SCM Consulting Limited: The registrant made no disbursements on behalf of SCM Consulting Limited for registrable activities during the reporting period.

The registrant made disbursements on behalf of SCM Consulting Limited and System Capital Management (SCM) affiliated persons in connection with nonregistrable activities during the reporting period.